

4. Defendants are working diligently to prepare their responses, and need an additional twenty-one (21) days (until May 2, 2025) to assess the allegations in the Second Amended Complaint and complete their responses.

5. Defendants do not make this motion for any improper purpose or for purposes of delay. Plaintiff will not be prejudiced by the Court granting this motion, as Defendants are only seeking a twenty-one (21) day extension and discovery has been stayed while the parties engaged in settlement discussions and while Plaintiff retained new counsel.

6. Defendants met and conferred with Plaintiff by e-mail on April 8, 2025, to request Plaintiff's position and/or consent regarding the proposed twenty-one (21) day extension. Plaintiff confirmed that he does not oppose the motion.

7. This is the Defendants' first request for an extension of time to file their responses to the Second Amended Complaint.

WHEREFORE, Defendants respectfully request that the Court grant their first motion for extension of time to file responses to the Second Amended Complaint, grant Defendants an extension of time of twenty-one (21) days, up to and including May 2, 2025, to file their responses to the Second Amended Complaint, and for such other and further relief as this Court deems just and proper under this circumstances.

Dated: April 10, 2025

**Katelynn Banks, iSellMLS.com, Inc., Cindy
Banks, Tony Banks, Eirik Somerville, and
Shimply Corporation**

By: /s/ Mitchell J. Edlund
One of their attorneys

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CERTIFICATE OF SERVICE

I hereby certify that on April 10, 2025, a copy of the foregoing was filed electronically with the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent to all counsel of record via the Court's CM/ECF automated filing system.

/s/ Mitchell J. Edlund

Mitchell J. Edlund

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